

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PHILIP L. TROPEANO, PETER TROPEANO,
and CAROLYN PATTON,

Plaintiffs,

V.

DOCKET NO.
03-CV-12231-RGS

CHARLENE DORMAN, BIANCA DORMAN,
LYDIA DORMAN, TODD DORMAN, T&N
REALTY TRUST and CAPTAIN PARKER
ARMS PARTNERSHIP,

Defendants.

(Leave to file granted on December 14, 2007)

SECOND AFFIDAVIT OF THOMAS M. CIAMPA

I, Thomas M. Ciampa, on oath, do depose and say as follows:

1. I am an attorney licensed to practice in the Commonwealth of Massachusetts and am counsel to the Plaintiffs in this action.

2. I make this affidavit to put before the Court certain documents in support of Plaintiffs' Reply to Defendants Opposition to Motion *In Limine* to Determine the Applicability of a Minority Interest and/or Lack of Marketability Discount.

3. Each side has agreed that it will not challenge the authenticity of documents that it produced during discovery in this matter. As indicated by the bates stamp prefixes Dorman-CPA and Dorman-CD, all of the documents attached hereto were produced by the defendants during discovery in this matter.

4. Attached hereto as Exhibit A is a copy of the original Captain Parker Arms Partnership agreement.

5. Attached hereto as Exhibit B are select transcript pages from the February 26, 1996 deposition of Alfred P. Tropeano in the matter entitled Emily A. Tropeano, Individually and as Executrix of the Estate of Joseph C. Tropeano or Successor to his Interest v. Alfred P. Tropeano, et al., Middlesex Probate and Family Court, Docket No. 94E-0216-G1, including a signed Certificate and Errata Sheet.

6. Attached hereto as Exhibit C are copies of the federal partnership tax returns filed by the Partnership to account for the property located at 125 Worthen Road and the business operated thereon for 2002-2005 (minus Schedule K-1s).

7. Attached hereto as Exhibit D are copies of letters dated October 28, 1991 and March 20, 1992, respectively, from Alfred Tropeano to Emily Tropeano setting out the calculation by which the Partnership valued Joseph Tropeano's former partnership interest.

8. Attached hereto as Exhibit E are copies of documents memorializing the Partnership's redemption from Joan Ripley, Wade Ripley, and Lynne Preston of a 17.65% interest in the Partnership.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 14th day of December, 2007.

____/s/ Thomas M. Ciampa____

Certificate of Service

I, Thomas M. Ciampa, hereby certify that on this 14th day of December, 2007, this document was filed through the CM/ECF and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

____/s/ Thomas M. Ciampa____